

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

United States of America,	*	Case No. 3:24 cr 14
	*	
Plaintiff,	*	
vs.	*	Hon. Jeffrey J. Helmick
	*	
Jeremy Adams,	*	
	*	
Defendant.	*	
	*	
	*	
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**MOTION TO VACATE TRIAL DATE AND RELATED DEADLINES**

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The Defendant, Jeremy Adams, moves this Court for an order vacating the trial date and related deadlines in this matter. This request is based on ongoing plea negotiations, difficulties with discovery review and discovery thumb drives at CCNO, and the ongoing CJA payment pause. The discovery in this matter is voluminous, as is the sheer volume of case-related documents, including transcripts. After a thorough review, counsel for the government and Mr. Adams have begun meaningful plea negotiations. Based on these discussions, there is the real potential that this matter could be resolved short of trial.

Additionally, counsel mailed a thumb drive to CCNO containing a variety of documents

for Mr. Adams' review. As of July 24, 2025, Mr. Adams did not have possession of the thumb drive. Nor, for that matter, did Mr. Adams have access to a device with which he could review those documents.

Lastly, as this Court is well aware, there is an ongoing pause in payments to CJA counsel. The pause is anticipated to last through the end of September. As a result, counsel has been forced to seek out other work, both law-related and otherwise, to help stay financially afloat.

Counsel discussed this motion with Mr. Adams on July 24, 2025, and he has no objection to this request. Similarly, given the ongoing and seemingly productive plea negotiations, the government has no objection to this request.

Respectfully submitted,

/s/ Neil S. McElroy  
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**CERTIFICATION**

This Motion was filed through the Court's electronic file system. Accordingly, all counsel of record will receive service through the electronic filing system.

/s/ Neil S. McElroy  
Neil S. McElroy